

# Oadby & Wigston Borough Council

## Operational Internal Audit Plan – 2017/18

March 2017



Bringing public value to life

**cw audit**  
internal audit services

# 1. Introduction

## General background

This document sets out a proposed operational plan of Internal Audit coverage for the period April 2017 to March 2018.

The proposed plan supports an opinion based on an assessment of the design and operation of the Council's internal control, governance and risk management arrangements noted from our risk-based audits carried out during the year. It follows therefore that the focus of the audit plan is critical to ensuring the right level of assurance to the Council.

## The aim of the plan is to:

- **Deliver a risk focused audit programme** – through detailed risk assessment across the organisation and at component level.
- **Be proactive and forward looking** – by looking at what risks the Council faces and trying to minimise these through our work.
- **Add value** - through commercial recommendations and aiming to save resources/enhance controls where possible.
- **Engage with stakeholders** – thereby achieving greater impact across the organisation.
- **Support the Policy, Finance and Development Committee** – as one of the key stakeholders and as those who are charged with governance, we will work with the Policy, Finance and Development Committee with regard to supporting its work plan for the year.

## Internal Audit Charter

The standards for Internal Audit require us to explicitly detail our terms of reference/charter with you. These have been developed in accordance with relevant guidance and are attached at Appendix Two.

## Public Sector Internal Audit Standards

In conducting our work as your Internal Auditors we are required to adhere to a set of standards for Public Sector Internal Auditors. We believe that we have in place suitable policies and procedures to ensure full compliance against these standards. We will, however, report any instances of non-compliance that do arise as soon as we are aware of them.

## Quality Assurance

Quality assurance is driven by our own quality procedures and externally by consideration of your views. All assignments are subject to our quality control procedures; these are designed to meet the requirement of regulators, appropriate auditing standards and External Audit colleagues. Council managers are engaged throughout the assignment to allow any concerns to be raised (if necessary). It is important to us that we meet your expectations. As such it is essential we measure how satisfied you are with our services and find ways to improve our service to you.

## 2. Developing the plan

Our plan of work is designed to support the annual Head of Internal Audit Opinion. The required basis for forming this opinion is as follows:

- An assessment of the design and operation of the overall internal control environment, governance and risk management arrangements; and
- An assessment of the adequacy and effectiveness of controls, based upon the results of our risk based audit assignments that are reported during the course of the year.

It follows that an effective risk based audit plan, focusing the audit resources into areas of principal risk is essential.

### **Risk Assessment**

The plan has been prepared in consultation with the Interim Section 151 Officer and the Senior Management Team generally. It has been informed by:

- A review of the risks contained within the Council's Risk Register and Annual Governance Statement.
- Discussions with Interim Heads of Service to identify key auditable areas based on an assessment of current and future issues and risks.
- Our understanding of the challenges to the Council to deliver its objectives within the current economic environment and changes in local government legislation.

On the basis of this process we have identified a number of priority areas (see section 3) and the resulting Internal Audit Plan is detailed at Appendix One. We will, however, continue to review the audit plan on an ongoing basis

in response to developments and initiatives. If additional risks arise or change in priority during the year the audit plan will be reconsidered with management and, subject to Policy, Finance and Development Committee approval, amended to ensure that audit resources remain focused on the key risk areas.

### 3. Linking your plan to your business

The following table sets out the proposed areas of work linked through to your business objectives/risk and showing the supporting rationale for that work and a summary outline of the work to be undertaken.

Area	Rationale - Links to Objectives/Risks	Work outline
<b>Corporate Assurance</b>		
Performance Management	Delivery of the objectives of the recently-introduced performance management framework/approach is vital in supporting the delivery of the Council's strategic and operational objectives and ensuring best use of resources.	To assure on the recently-introduced performance management framework/approach.
Business Continuity	The Council needs to have in place tested adequate and effective Business Continuity Planning to cope with emergencies, with key corporate elements planned for centrally and each team planning locally for other relevant aspects.	To assure on the suitability and effectiveness of arrangements to ensure business continuity through emergencies.
IT & Information risk assessment	The Council is dependent on its IT infrastructure and systems to enable and support the delivery of all of its services and functions. Effective management of these assets in collaboration with the outsourced IT provider Steria is thus key to the effective running of the Council.	Risk assessment of the Council's IT infrastructure, systems and services to identify key actions and areas requiring further review.
Capital Programme	Material area of Council spend. There is a need to ensure projects within the programme are properly managed so that they are delivered on time and within budget and meet required objectives.	Review of the arrangements to govern the capital programme and constituent projects.
Anti Fraud & Corruption-targeted fraud prevention/detection work	The Council is at risk of fraud in a range of areas; national guidance in 2012 set out expectations on the Council with regard to addressing these risks. Risk of fraud is recognised in the Councils' risk register.	Proactive work to consider key areas at risk of fraud/corruption.
Project assurance (eg Housing Company, System Support, Asset Management)	The Council has a number of projects ongoing at present and independent input can contribute to effective project management through to completion.	Provision to enable support, advice and assurance on key projects.
Procurement	There is a need to ensure that the Council complies with relevant procurement legislation depending on the levels of expenditure involved whilst obtaining VFM.	Assurance on processes to control and obtain VFM from procurement.
<b>Resources – Finance, Procurement &amp; ICT</b>		
Budgetary Control / MTFS – key risk areas/savings plans assurance	Financial strategy and management is key in managing through ongoing funding reductions. Various financial risks are reflected in the risk register, and the prudence, robustness and flexibility of the Council's budget is vital in enabling the Council to respond to funding and other economic risks and pressures.	To consider the adequacy and robustness of managerial control processes regarding the medium term financial strategy, budget setting and management, including a targeted review to support and assure on key areas of change/savings within the MTFS.
Financial systems (ledger, creditors, debtors, treasury management, income management & cash receipting-key controls)	Key financial systems requiring regular assurance - governing payment to suppliers, income raising and collection (debt and cash), management of investments and borrowing – material and fundamental systems for the Council's financial resilience, and the financial reporting system from which the council's statutory accounts are prepared.	Review of key controls over fundamental financial systems.
IT contract assurance	The Council is dependent on its IT infrastructure and systems to enable and support	Review and assurance on the new IT service contract with Steria.

Area	Rationale - Links to Objectives/Risks	Work outline
	the delivery of all of its services and functions. Effective management of this vital outsourced service to Steria is thus key to the effective running of the Council.	
<b>Corporate Resources</b>		
Payroll & Expenses	Key financial system covering payment of salaries/wages and expenses to employees and members. Processing of the payroll is outsourced.	Assurance on this key financial and HR system.
Taxi and Hackney Carriage Licensing	Following high profile cases elsewhere in the country regarding safeguarding and child sex exploitation involving taxi drivers, there is a need to ensure that consistent and effective policies and processes are in place at the Council in relation to the licensing of taxi drivers.	Assessment of controls within the policies and processes to ensure local residents and service users are safeguarded in relation to the suitability of taxi/hackney carriage drivers, as a learning opportunity following concerns raised elsewhere in the country.
<b>Customer Services</b>		
Benefits / Council Tax Support	Key financial system of great importance to local population, requiring regular assurance.	Review of fundamental financial and public-facing system.
Council Tax	Key financial system requiring regular assurance. Increased risk of non-collection given localisation of Council Tax Support and impact on certain types of benefit/claimants.	Review of fundamental financial and public-facing system.
Business Rates	Key financial system requiring regular assurance. Increased risks and opportunities arising from business rates changes nationally.	Review of fundamental financial and public facing system. Provision included to enable account to be taken of recent national changes to Business Rates arrangements.
<b>Planning, Development &amp; Regeneration</b>		
Management of Section 106 agreements and related contributions	Section 106 agreements further to planning permissions provide both funds to address specific local needs and also commit developers to important obligations. The Council needs to ensure that the agreements are complied with, funding received by the Council in a timely manner and used to deliver the Council's objectives regarding the local environment.	Assurance on management processes to ensure developer obligations are met and financial contributions obtained and used in accordance with legal agreements. Important both financially to the Council and in terms of supporting objectives for the Borough.
<b>Community</b>		
Housing Rents	Key revenue source to the Council and key element of HRA Business Plan.	Review of fundamental financial and public facing system
Repairs & Voids key controls/follow-up	Key system of great importance to tenants and, to the Council in terms of financial spend and income, and, maintenance and use of its housing stock, requiring regular assurance.	Provision for review of key controls and follow up of agreed actions in relation to these key processes for the housing stock/tenants.
<b>Operations</b>		
Fuel and valuable asset control	The Council needs to ensure it has adequate procedures in place to identify and safeguard its material assets which are vital to ensuring ongoing service delivery.	Assurance on the sound security and control of valuable assets ie prevention of loss, theft, wastage.

## 4. Reporting and relationships

### 4.1 Reporting Lines

The Internal Audit Charter attached at Appendix 2 outlines the reporting lines and relationships for this engagement, essentially setting out the accountability of the Head of Internal Audit to the Chief Executive, but noting that operationally in practice this accountability is delegated to the Interim Section 151 Officer. The Head of Internal Audit also has direct right of access to the Policy, Finance and Development Committee and the Chairman where required. This is also embodied in the Council's Financial Regulations.

#### Audit Reporting

##### Periodic and Assignment Reporting

Final reports relating to individual audit assignments will be reported to the relevant operational manager and Head of Service prior to submission to the Policy, Finance and Development Committee (where relevant), which will also receive a progress update at each meeting detailing progress against the plan, a summary of assignment opinions issued to date and an update in relation to the implementation of audit recommendations.

##### Annual Head of Internal Audit Opinion

In line with the PSIAS and expected professional practice, we will issue a formal audit opinion taking account of:

- An assessment of the design and operation of the overall internal control environment, governance and risk management arrangements; and
- An assessment of the adequacy and effectiveness of controls, based upon the results of our risk based audit assignments that are reported during the course of year.

This opinion will be formally recorded in the Internal Audit Year End Report and presented to the Policy, Finance and Development Committee. In addition to this formal opinion we will also bring to the attention of the Chief Executive, Interim Section 151 Officer and the Policy, Finance and Development Committee any Significant Internal Control Issues that we feel should be declared in your Annual Governance Statement.

### 4.2 Third Party Audit Arrangements

As your Internal Auditors we are required to agree with you the arrangements for forming an appropriate opinion where either you operate key systems on behalf of other organisations, or key systems are being operated by other organisations on your behalf. We recognise that the Council operates within a number of different partnership arrangements and procures and contracts various services. We are aware that the Council procures two key systems from external providers as follows:

- Payroll – from EMSS
- ICT Services (as part of the Leicestershire ICT Partnership) – from Sopa Steria

We recommend that you review and where appropriate update the contracts/SLAs for these purchased services to explicitly detail your right to an annual audit opinion or reserve the right of your Internal Auditor to perform their own work as deemed necessary to derive an opinion. You should liaise with your external auditors to ensure that they are comfortable with the arrangements you agree. Our audit plan has been prepared on the basis that we will not be required to perform any detailed audit work on the transaction processes operated within any such service providers but that we would, on a risk basis, review the systems operated by the Council that feed into and flow from this purchased service. We are not aware at this stage of any key systems operated by the Council on behalf of other organisations.

### **4.3 Relationships with external bodies**

#### **External Audit**

We will agree a protocol of joint working arrangements supported by a regular programme of update meetings with External Audit. We will use these meetings to report on progress against our plan and as an opportunity to discuss any significant issues arising from our work.

#### **Other Review Bodies**

Where we intend to place formal reliance on the work of any other review body e.g. external auditor, we will undertake an appropriate audit or quality assurance exercise to ascertain the level of assurance that we can derive from that work.

#### **Counter Fraud**

You are required to carry out counter fraud activities, to ensure sound stewardship of public funds. We will liaise as necessary with your counter fraud officers, sharing relevant audit findings and identifying joint programmes of work where appropriate.

### **4.4 Additional Services/Ad-hoc Work**

The PSIAS requires us to define the potential role that we may have in providing ad hoc consultancy work. In providing such a service we would seek to apply the professional skills of Internal Audit through a systematic and disciplined evaluation of the policies, procedures and operations that you have put in place to ensure the achievement of your objectives. We believe that our status as Internal Auditors ensures that we can deliver such work in an independent and objective manner.

## 5. Delivery

### 5.1 The Core Audit Team

The Audit Plan will be delivered by the following team:

Team Role	Team Member	Qual	Role
Contract Lead	Paul Dudfield	CCAB	Paul will monitor overall performance and quality of the service
Chief Internal Auditor	Tim Ridout	CCAB	Tim will oversee delivery of the audit plan, manage and deliver elements of the plan, and ensure quality assurance
Audit Manager	Anand Persaud	CCAB	Anand will manage and deliver the core plan.

### 5.2 Profiling Delivery

We will agree a programme of delivery for the audit plan with the Interim Heads of Service. We will report on compliance against this profiled delivery through our regular progress reports to each Policy, Finance and Development Committee.

## 6. Recommendation

It is recommended that the Policy, Finance and Development Committee considers and approves the Internal Audit Plan 2017/18 and Internal Audit Charter.

**Tim Ridout**  
**Chief Internal Auditor**

## Operational Internal Audit Plan

Area	Audit Assignment	2017/18 Proposed time
Corporate assurance	Performance Management	10
	Business Continuity	10
	IT & Information risk assessment	12
	Capital Programme	12
	Anti Fraud & Corruption-targeted fraud prevention/detection work	10
	Project assurance (eg Housing Company, System Support, Asset Management)	10
	Procurement	10
	<b>Sub-total</b>	<b>74</b>
Resources – Finance, Procurement & ICT	Budgetary Control	8
	Financial systems (ledger, creditors, debtors, treasury management, income management & cash receipting-key controls	25
	MTFS – key risk areas/savings plans assurance	8
	IT contract assurance	10
	<b>Sub-total</b>	<b>51</b>
Corporate Resources	Payroll & Expenses	8
	Taxi and Hackney Carriage Licensing	10
	<b>Sub-total</b>	<b>18</b>
Customer Services	Council Tax	10

Area	Audit Assignment	2017/18 Proposed time
	Business Rates	15
	Benefits/Council Tax Support	10
	<b>Sub-total</b>	<b>35</b>
Planning, Development & Regeneration	Management of Section 106 agreements and related contributions	10
	<b>Sub-total</b>	<b>10</b>
Community	Housing Rents	10
	Repairs & Voids key controls/follow-up	12
	<b>Sub-total</b>	<b>22</b>
Operations	Fuel and valuable asset control	10
	<b>Sub-total</b>	<b>10</b>
Follow Up / Contingency	Recommendation Tracking	8
	Follow Up Reviews	10
	Contingency	10
	<b>Sub-total</b>	<b>28</b>
Management & Advice	Audit Needs Assessment, Planning & Annual Report	5
	Policy, Finance & Development Committee/External Audit/Senior Team meetings	10
	Contract Management & ad hoc advice	10
	<b>Sub-total</b>	<b>25</b>
<b>Total</b>		<b>273</b>

NB given carried forward days not delivered in relation to 2016/17 internal audit plan, the 2017/18 plan will be delivered at a cost equivalent to 250 days of audit time.

## INTERNAL AUDIT CHARTER

### 1. DEFINITION

Internal Audit is an independent and objective appraisal service within the organisation:

- Internal Audit primarily provides an independent and objective opinion to the Accountable Officer (Chief Executive), the Council and the Policy, Finance and Development Committee on the degree to which risk management, internal control and governance arrangements support the achievement of the organisation's agreed objectives. In addition, Internal Audit's findings and recommendations are beneficial to line management in the audited areas. Risk management, internal control and governance comprise the policies, procedures and operations established to ensure the achievement of objectives, the appropriate assessment of risk, the reliability of internal and external reporting and accountability processes, compliance with applicable laws and regulations, and compliance with the behavioural and ethical standards set for the organisation.
- Internal Audit also provides an independent and objective consultancy service specifically to help line management improve the organisation's risk management, control and governance arrangements. The service applies the professional skills of Internal Audit through a systematic and disciplined evaluation of the policies, procedures and operations that management have put in place to ensure the achievement of the organisation's objectives, and through recommendations for improvement. Such consultancy work contributes to the opinion, which Internal Audit provides on risk management, control and governance. Approval for any significant additional consulting services not already included in the audit plan will be sought from the Policy, Finance and Development Committee prior to accepting the engagement.

### 2. STANDARDS AND ETHICS

Internal Audit acknowledges the mandatory nature of the Definition of Internal Audit, the Code of Ethics and the Standards contained in the Public Sector Internal Audit Standards. Internal Audit shall also work in accordance with any performance measures agreed with the Policy, Finance and Development Committee.

### 3. INDEPENDENCE, OBJECTIVITY AND CONFLICTS OF INTEREST

All internal audit activities shall remain free of influence by any element in the organisation, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of an independent and objective mental attitude necessary in rendering reports. Internal Auditors shall have no executive or direct operational responsibility or authority over any of the activities they review. Individual auditors will have an impartial, unbiased attitude, characterised by integrity and an objective approach to work, and should avoid conflicts of interest. Individual auditors must declare any conflict of interest to the Head of Internal Audit. Any conflicts of interest encountered by the Head of Internal Audit must be declared to the Head of Service / Interim Section 151 Officer. Internal Auditors will have regard to the Committee on Standards of Public Life's Seven Principles of Public Life.

### 4. AUTHORITY and ACCOUNTABILITY

Internal Audit derives its authority from the Council, the Accountable Officer and Policy, Finance and Development Committee. The Head of Internal Audit reports on a functional basis to the Council via the Policy, Finance and Development Committee. For administrative purposes, the Head of Internal Audit reports to the Head

of Service / Interim Section 151 Officer. The Head of Internal Audit has a direct right of access to the Chair of the Policy, Finance and Development Committee and the Chair of the organisation if deemed necessary. The Policy, Finance and Development Committee may have private meetings with the Head of Internal Audit. The Policy, Finance and Development Committee approves all Internal Audit plans and may review any aspect of its work.

## **5. INTERNAL AUDIT TEAM**

The Head of Internal Audit is responsible for ensuring the team is adequately staffed and that there is access to the full range of knowledge, skills, qualifications and experience to deliver the Internal Audit Plan in line with the Public Sector Internal Audit Standards. The team will undertake regular assessments of professional competence through an on-going appraisal and development programme (i.e. Personal Development Plans and Continuing Professional Development) with training provided where necessary. Auditors also have responsibilities for applying due professional care when performing their duties. The Head of Internal Audit must hold a professional qualification.

If the Head of Internal Audit, Chief Executive, Head of Service / Interim Section 151 Officer or the Policy, Finance and Development Committee consider that the level of Internal Audit resources or the terms of reference in any way limit the scope of Internal Audit, or prejudice the ability of Internal Audit to deliver a service consistent with the definition of internal auditing, they should advise the Council accordingly.

## **6. SCOPE**

The Head of Internal Audit is responsible for developing and maintaining an Internal Audit plan for providing the Chief Executive, economically and efficiently, with objective evaluation of, and opinions on, the effectiveness of the organisation's risk management, control and governance arrangements. The Head of Internal Audit's opinion is a key element of the framework of assurance the Chief Executive needs to inform the completion of the Annual Governance Statement. This strategy will be realised through the delivery of considered and approved annual plans. These will systematically review and evaluate risk management, control and governance which comprises the policies, procedures and operations in place to:

- Establish, and monitor the achievement of, the organisations objectives.
- Identify, assess and manage the risks to achieving the organisations objectives.
- Ensure the economical, effective and efficient use of resources.
- Ensure compliance with established policies (including behavioural and ethical expectations), procedures, laws and regulations.
- Safeguard the organisation's assets and interests from losses of all kinds, including those arising from fraud, irregularity or corruption.
- Ensure the integrity and reliability of information, accounts and data, including internal and external reporting and accountability processes.

Internal Audit's planning will embrace risk management, control and governance processes of the organisation including all its operations, resources, services and responsibilities for other bodies.

## **7. APPROACH**

To ensure delivery of its objectives, Internal Audit will develop and implement an audit strategy/plan. This will be prepared each year and will describe arrangements for the delivery of the internal audit service based upon knowledge of the organisation's objectives, risk assessment, and appropriate management consultation. The allocation of resources between assurance and consultative work will be set out. A detailed Annual Operational Plan will be prepared designed to implement the

audit strategy. The audit strategy and annual plans shall be prepared to support the audit opinion to the Accountable Officer on the risk management, internal control and governance arrangements within the organisation. The strategy (delivered through the operational plan) will be approved by the Policy, Finance and Development Committee and reported to the Council.

## **8. REPORTING**

Internal Audit will report formally to the Policy, Finance and Development Committee through the following:

An annual report will be presented to confirm completion of the audit plan and will include the Head of Internal Audit opinion provided for the Accountable Officer that will support the Annual Governance Statement. The Head of Internal Audit opinion will:

- a) State the overall adequacy and effectiveness of the Council's risk management, control and governance processes;
- b) Disclose any qualification to that opinion, together with the reasons for the qualification;
- c) Present a summary of the audit work undertaken to formulate the opinion, including reliance placed on work by other assurance bodies;
- d) Draw attention to any issues internal audit judge as being particularly relevant to the preparation of the Annual Governance Statement;
- e) Compare work actually undertaken with the work which was planned and summarise performance of the internal audit function against its performance measures criteria; and
- f) Comment where necessary on compliance with the Public Sector Internal Audit Standards and internal quality assurance arrangements.

For each Policy, Finance and Development Committee meeting a progress report will be presented to summarise progress against the plan. The findings arising from individual audit reviews will be reported in accordance with Policy, Finance and Development Committee requirements. The Policy, Finance and Development Committee members will be provided with copies of individual audit reports for each assignment undertaken unless the Head of Internal Audit is advised otherwise. The reports will include an action plan with target dates for completion (wherever relevant).

Following the closure of fieldwork, Internal Audit will discuss findings with operational/local managers. Operational/Local management will receive draft reports which will include the action plans they have agreed following the discussion of findings. A copy of the draft report will also be provided to the relevant Head of Service. The draft report will give an "assurance" opinion on the area reviewed, wherever relevant. The draft report will also indicate action ratings for individual report findings and recommendations.

Operational management will be required to respond to the draft report, stating their agreement or otherwise to the content of the report, identifying action, staff with responsibility for implementation and the dates by which action will be taken. Final reports inclusive of management comments will be issued by Internal Audit to the relevant Executive Director within 5 working days of management responses being received. The final report will be placed on (or referred to in) the agenda for the next available Policy, Finance and Development Committee. Internal Audit will make provision to review the implementation of agreed action within the agreed timescales. However, where there are issues of particular concern provision maybe made for follow up review within the same financial year. Issue and clearance of follow up reports shall be as for other assignments referred to above.

## **9. IRREGULARITIES, FRAUD AND CORRUPTION**

It is the responsibility of management to maintain systems that ensure organisation's resources are utilised in the manner and on activities intended. This includes the responsibility for the prevention and detection of fraud and other illegal acts. Internal Audit shall not be relied upon to detect fraud or other irregularities. However, Internal Audit will give due regard to the possibility of fraud and other irregularities in work undertaken. Additionally, Internal Audit shall seek to identify weaknesses in control that could permit fraud or irregularity. If Internal Audit discovers suspicion or evidence of fraud or irregularity, this will immediately be reported to the organisation's Counter Fraud Specialist (if/where appropriate) in accordance with the organisation's Counter Fraud Policy & Fraud Response Plan.

#### **10. RELATIONSHIPS**

In order to maximise its contribution to the Council's overall framework of assurance, Internal Audit will work closely with the organisation's Head of Service/Interim Section 151 Officer in planning its work programme. Co-operative relationships with line management enhance the ability of internal audit to achieve its objectives effectively. Audit work will be planned in conjunction with management as far as possible, particularly in respect of the timing of audit work.

Internal Audit will meet regularly with the external auditor to consult on audit plans, discuss matters of mutual interest, discuss common understanding of audit techniques, method and terminology, and to see opportunities for co-operation in the conduct of audit work. In particular, internal audit make available their working files to the external auditor for them to place reliance upon the work of Internal Audit where appropriate

The Head of Internal Audit will establish a means to gain an overview of other assurance providers' approaches and output as part of the establishment of an integrated assurance framework. In addition the Head of Internal Audit shall make provision to form an opinion where key systems are being operated by organisation's outside of the remit of the Accountable Officer, or through a shared or joint arrangement.

#### **11. ACCESS**

Internal Audit shall have the authority to access all the organisation's information, documents, records including patient records where appropriate, assets, personnel and premises that it considers necessary to fulfil its role. This shall extend to the resources of the third parties that provide services on behalf of the organisation. All information obtained during the course of a review will be regarded as strictly confidential to the organisation and shall not be divulged to any third party without the prior permission of the Accountable Officer. However, open access shall be granted to the organisation's external auditors. In any instances of conflict this will be referred for resolution to the Section 151 Officer, Chief Executive or Chair of Policy, Finance and Development Committee as appropriate.

#### **12. QUALITY ASSURANCE**

The work of internal audit is controlled at each level of operation to ensure that a continuously effective level of performance, compliant with the Public Sector Internal Audit Standards is being achieved. The Head of Internal Audit will establish a quality assurance programme designed to give assurance through internal and external review that the work of internal audit is compliant with the Public Sector Internal Audit Standards and to achieve its objectives. A commentary on compliance against the Standards will be provided in the annual audit report to Policy, Finance and Development Committee.

#### **13. APPROVAL, REVIEW AND INTERPRETATION OF THE CHARTER**

This Internal Audit Charter shall be reviewed annually and approved by the Policy, Finance and Development Committee.